

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SONYA LYNETTE MOYE-DANIELS**

**Bankruptcy No. 25-01221-JAW**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, First Metropolitan Financial Services, Inc. - Clinton Branch ("First Metropolitan") by and through its attorney of record and files this, its Objection to Confirmation of Chapter 13 Plan as to the Creditor's treatment for the purpose of plan confirmation and would respectfully show unto the Court, as follows:

1. On or about May 12, 2025, Debtor filed a petition for bankruptcy pursuant to Chapter 13 of the United States Bankruptcy Code. As of the date of filing, Debtor is indebted to First Metropolitan in the sum of \$7,339.35 on Account #5372, plus interest accruing thereafter, late fees, attorney's fees, and other expenses.

2. First Metropolitan's claim is secured by property contained in the duly perfected UCC financing statement which was filed by First Metropolitan. A copy of the documentation evidencing First Metropolitan's lien is attached hereto and made apart of the same as if copied in full herein. The value of the collateral securing the debt makes First Metropolitan fully secured.

3. First Metropolitan denies that all the collateral is exempt as listed in the proposed plan and objects to Debtor's claim of exemption for that property which is not exempt pursuant to Miss Code Ann. § 85-3-1, et seq. or other applicable law. First Metropolitan denies that the lien on Debtor's property impairs all exemptions to which debtor would be entitled under 11 U.S.C. § 522(b).

4. To the extent that First Metropolitan is not paid the replacement value of its collateral with interest, First Metropolitan rejects debtor's plan.

5. Debtor's Chapter 13 Plan proposes to surrender the collateral securing the loan back to First Metropolitan. First Metropolitan would hereby request an opportunity to view and examine the following collateral securing the loan prior to a hearing on this matter: (1) Polaris 4-wheeler serial number HPOLPP202BX2; (2) Scag Lawnmower Serial number 000001596; (3) a 75" Samsung television and a 85" Samsung television to First Metropolitan.

**WHEREFORE, PREMISES CONSIDERED,** First Metropolitan Financial Services, Inc. - Clinton Branch requests that this Court to deny confirmation of Debtor's proposed plan and treatment and that First Metropolitan be paid in full at a rate according to the proper valuation and for other relief as is good and equitable and grant such other relief as is necessary under the circumstances.

Dated: July 14, 2025

First Metropolitan Financial Services, Inc.  
Clinton Branch

BY: /s/ B. Joey Hood, II  
B. Joey Hood, II - Its Attorney

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**CERTIFICATE OF SERVICE**

I, B. Joey Hood, II, attorney for First Metropolitan Financial Services, Inc. - Clinton Branch, do hereby certify that the following have been served electronically via ECF with a copy of this objection to confirmation.

- |    |                          |   |
|----|--------------------------|---|
| 1. | Thomas Carl Rollins, Jr. | <u><a href="mailto:trollins@therollinsfirm.com">trollins@therollinsfirm.com</a></u>     |
| 2. | U.S. Trustee             | <u><a href="mailto:USTPRegion05.JA.ECF@usdoj.gov">USTPRegion05.JA.ECF@usdoj.gov</a></u> |
| 3. | Torri Parker Martin      | <u><a href="mailto:tpm@tpmartinch13.com">tpm@tpmartinch13.com</a></u>                   |

Date: July 14, 2025

/s/ B. Joey Hood, II  
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